

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GREGORY THOMAS BERRY, *et al.*

Plaintiffs,

Civil Action No. 3:11cv754

v.

LEXISNEXIS RISK & INFORMATION
ANALYTICS GROUP, INC., *et al.*

Defendants.

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR
MOTION FOR LEAVE TO FILE A BRIEF IN EXCESS OF THE PAGE LIMIT**

Plaintiffs Gregory Thomas Berry, Summer Darbonne, Rickey Millen, Shamoone Saeed, Arthur B. Hernandez, Erika A. Godfrey and Timothy Otten, individually and on behalf of all others similarly situated, (“Plaintiffs”) respectfully submit this memorandum of law in support of their Motion for Leave to File a Brief in Excess of the Page Limit set forth by this Court.

Plaintiffs seek leave of the Court to file an omnibus Responses to Objections to Class Action Settlement brief collectively responding to the objections to the settlement in this case filed by five Class Members—JoAnn Nix, Adam Schulman, Megan Aaron, Jeanne Giles, and David Brown. These objections consisted of 126 pages cumulatively, including Mr. Schulman’s *pro se* brief that alone consisted of fifty-three pages. Plaintiffs’ proposed brief responds to these objections in detail, and thoroughly discusses the applicable factual and legal issues that the Court will consider.

Neither Party would suffer any prejudice. Indeed, the Plaintiffs submit this Motion with the consent of the Defendants. Therefore, for good cause shown, Plaintiffs respectfully request

that the Court enter an order permitting them to file an omnibus brief not exceeding seventy-five pages in response to the 126 pages of briefing submitted by the various objectors.

Respectfully submitted,
PLAINTIFFS

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of November, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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